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33 *Attorneys for Defendant Google LLC*

34 **UNITED STATES DISTRICT COURT**

35 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

36 CHASOM BROWN, WILLIAM BYATT,
37 JEREMY DAVIS, CHRISTOPHER
38 CASTILLO, and MONIQUE TRUJILLO,
39 individually and on behalf of all similarly
40 situated,

41 Plaintiffs,

42 v.

43 GOOGLE LLC,

44 Defendant.

45 Case No. 4:20-cv-03664-YGR-SVK

46 **DECLARATION OF MARIE
47 HAYRAPETIAN IN SUPPORT OF JOINT
48 SUBMISSION RE: SEALING PORTIONS
49 OF JULY 15, 2022 ORDER CLARIFYING
50 PRESERVATION PLAN (DKT. 630)**

51 Referral: Hon. Susan van Keulen, USMJ

1 I, Marie Hayrapetian, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Parties’
7 Joint Submission Re: Sealing Portions of the July 15, 2022 Order Clarifying Preservation Plan (Dkt.
8 630) (“Order”), which consists of the July 15 Order and Exhibit 1. In making this request, Google
9 has carefully considered the relevant legal standard and policy considerations outlined in Civil Local
10 Rule 79-5. Google makes this request with the good faith belief that the information sought to be
11 sealed consists of Google’s confidential and proprietary information and that public disclosure could
12 cause competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portion identified in the
14 Order and the entirety of Exhibit 1.

15 4. The information requested to be sealed contains non-public, sensitive confidential
16 business information related to Google’s internal technological systems that could affect Google’s
17 competitive standing and may expose Google to increased security risks if publicly disclosed,
18 including internal data security measures, various types of Google’s internal projects, data signals,
19 and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as
20 confidential in the ordinary course of its business and is not generally known to the public or
21 Google’s competitors.

22 5. Such confidential and proprietary information reveals Google’s internal strategies,
23 system designs, and business practices for operating and maintaining many of its important services,
24 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 1-
25 2.

26 6. Public disclosure of such confidential and proprietary information could affect
27 Google’s competitive standing as competitors may alter their identifier system designs and practices
28 relating to competing products. It may also place Google at an increased risk of cyber security

1 threats, as third parties may seek to use the information to compromise Google's data sources,
2 including data logs, internal data structures and internal identifier systems.

3 7. On July 22, 2022, the parties conferred on the proposed redactions to the Order.
4 Plaintiffs take no position on sealing the proposed redactions.

5 I declare under penalty of perjury of the laws of the United States that the foregoing is true
6 and correct. Executed in Los Angeles, California on July 22, 2022.

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8 DATED: July 22, 2022

9 QUINN EMANUEL URQUHART &
10 SULLIVAN, LLP

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12 By /s/ Marie Hayrapetian
13 Marie Hayrapetian

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15 *Attorney for Defendant*

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